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June 12, 2025

Via ECF

Hon. Lewis J. Liman, U.S.D.J.
United States District Court for the Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: *Grifols, S.A., et al. v. Yu, et al.* No. 1:24-cv-00576-LJL; Joint Request to Reschedule Initial Pre-Trial Conference.

Dear Judge Liman,

We represent Defendants Daniel Yu, Gotham City Research, LLC, General Industrial Partners, LLP, and Cyrus De Weck (“Defendants”). We submit this joint request together with Plaintiff Grifols, S.A. Pursuant to section 4(B) of Your Honor’s Individual Practice Rules, the Parties write to respectfully request entry of the attached Stipulation and Proposed Order rescheduling the Initial Pre-trial Conference and setting Defendants time to answer the Redacted Complaint.

The Stipulation and Order sets forth a date for Defendants’ answer on June 26, 2025 and three potential dates amenable to both Plaintiff and Defendants to reschedule the parties forthcoming Initial Pre-trial Conference that Your Honor set in on June 26, 2025 at 12:00 PM:

Thursday, July 17, 2025 at 12:00 PM

Tuesday, July 22, 2025 at 12:00 PM

Wednesday, July 23, 2025 at 12:00 PM.

If any of the three proposed dates and times are acceptable to Your Honor, the parties respectfully request the Court “So Order” the Stipulation and Proposed Order and have it entered on the Court’s docket. The Parties understand the Court may select its own rescheduled date and time as well.

We thank the Court for its time and consideration, and remain available should additional scheduling questions be necessary.

Respectfully,

/s/ David S. Korzenik

David S. Korzenik